



The Stop & Shop Supermarket Company

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An Ahold USA Company

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April 9, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

TRANSMITTED BY FACSIMILE

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

On behalf of The Stop & Shop Supermarket Company, I am writing in response to your request for comments regarding "Guidelines for the Interim Voluntary Country of Origin Labeling". I am Vice President of Produce for Stop and Shop Supermarkets headquartered in Boston, Massachusetts. We operate 335 stores in Connecticut, Massachusetts, New Jersey, New York and Rhode Island employing over 60,000 associates. Our parent company, Ahold, owns six supermarket chains on the east coast. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our produce department offers over 500 different selections of fresh fruits and vegetables to consumers on a daily basis. Our produce is sourced from many countries throughout the world to ensure that consumers have high quality produce at an affordable price throughout the year.

The task and cost of identifying the country of origin as required by the law for all of these products is enormous. The additional cost to segregate and identify the country of origin will ultimately cost the customer, the retailer and the supplier.

Additionally, as a retailer, in order to minimize the cost of additional slots and segregation, retailers may rely on one country at a time for products. As an example, during the summer, that would mean we would buy all Canadian tomatoes on the vine rather than domestic, as the stronger supply lies in Canada. There are other examples as well where the domestic producer could be hurt.

Lastly, our produce managers and customers cannot identify the country of origin on produce items unless the country is listed on the produce item itself. Many fresh produce items currently have an identification sticker on them. We ask that you require the suppliers to provide the country of origin on those stickers.

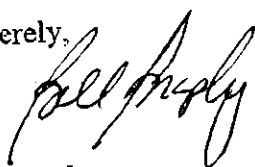
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As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for fresh fruits and vegetables at the growing, packing and processing stage accountable for providing complete accurate and verifiable information on the product itself.
- Provide for flexible means of informing consumers of the country of origin of fresh and frozen produce at retail; and
- Implement reasonable recordkeeping requirements.

Finally, we urge you to conduct the rulemaking promptly and efficiently. The statute states that retailers have to be in compliance on September 30, 2004. Respectfully, please issue regulations that will allow us to comply with the law without limiting our ability to continue to provide consumers with a fresh and abundant produce supply. Thank you for your time regarding this critical matter.

Sincerely,



Bill Brophy
Vice President Produce